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10 *Attorneys for Plaintiff, Deutsche Bank National Trust Company as Trustee for the Certificate-*
11 *holders of the Morgan Stanley ABS Capital I Inc. Trust 2003-NC10, Mortgage Pass-Through*
12 *Certificates, Series 2003-NC10*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 DEUTSCHE BANK NATIONAL TRUST
16 COMPANY AS TRUSTEE FOR THE
17 CERTIFICATEHOLDERS OF THE
18 MORGAN STANLEY ABS CAPITAL I INC.
19 TRUST 2003-NC10, MORTGAGE PASS-
20 THROUGH CERTIFICATES, SERIES 2003-
21 NC10,

Plaintiff,

vs.

22 FIDELITY NATIONAL TITLE GROUP,
23 INC.; CHICAGO TITLE INSURANCE
24 COMPANY; UNITED TITLE OF NEVADA,
25 INC.; DOE INDIVIDUALS I through X; and
26 ROE CORPORATIONS XI through XX,
27 inclusive,

Defendants.

Case No.: 2:20-cv-02268-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTIONS TO DISMISS [ECF Nos.
32-34]**

[Second Request]

22 Plaintiff, Deutsche Bank National Trust Company as Trustee for the Certificateholders of
23 the Morgan Stanley ABS Capital I Inc. Trust 2003-NC10, Mortgage Pass-Through Certificates,
24 Series 2003-NC10 (“Deutsche Bank”), Specially-Appearing Defendant Fidelity National Title
25 Group, Inc. (“Fidelity”) and Defendants Chicago Title Insurance Company (“Chicago Title”) and
26 United Title of Nevada, Inc. (“United Title”, collectively “Defendants”), by and through their
27 counsel of record, hereby stipulate and agree as follows:
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- 1 1. On December 15, 2020, Deutsche Bank filed its Complaint in Eighth Judicial District
- 2 Court, Case No. A-20-826490-C [ECF No. 1-1].
- 3 2. On December 15, 2020, Chicago Title filed its Petition for Removal to this Court [ECF
- 4 No. 1].
- 5 3. On March 31, 2021, Defendants filed their Motions to Dismiss [ECF No. 32-34].
- 6 4. Deutsche Bank's deadline to respond to Defendants' Motions to Dismiss is currently May
- 7 14, 2021 [ECF No. 41].
- 8 5. Deutsche Bank's counsel is requesting an extension until June 14, 2021, to file its response
- 9 to the pending Motions to Dismiss.
- 10 6. This extension is requested to allow counsel for Deutsche Bank additional time to finalize
- 11 and respond to the points and authorities cited to in Defendants' Motions as day-to-day
- 12 handling counsel for Deutsche Bank will be out on maternity leave.

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1 7. Counsel for Defendants does not oppose the requested extension.

2 8. This is the second request for an extension which is made in good faith and not for
3 purposes of delay.

4 **IT IS SO STIPULATED.**

5 DATED this 13th day of May, 2021.

DATED this 13th day of May, 2021.

6 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

7 /s/ Lindsay D. Robbins

/s/ Kevin S. Sinclair

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11 *Attorney for Plaintiff, Deutsche Bank*

Attorney for Defendants, Fidelity National

12 *National Trust Company as Trustee for the*

Title Group, Inc., Chicago Title Insurance

13 *Certificateholders of the Morgan Stanley*

Company and United Title of Nevada, Inc.

14 *ABS Capital I Inc. Trust 2003-NC10,*

Mortgage Pass-Through Certificates, Series

2003-NC10

15 **IT IS SO ORDERED.**

16 Dated May 14, 2021.

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UNITED STATES DISTRICT COURT JUDGE